

North Clackamas Urban Watersheds Council

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September 5, 2016

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OREGON OPERATIONS OFFICE

SEP 08 2016

EPA-REGION 10

U.S. EPA
805 SW Broadway, Suite 500
Portland, OR 97205

RE: Comments on EPA's Portland Harbor Superfund Proposed Cleanup Alternative

Dear Ms. McCarthy,

As the watershed council representing several urban tributaries to the Willamette River in the Portland Metro area, the North Clackamas Urban Watersheds Council (NCUWC) stands with the many community and environmental advocacy organizations demanding a more aggressive Portland Harbor Cleanup Plan. The proposed plan is a big win for industry and a bad deal for the public. On behalf of all people who rely on the river for food, recreation, employment and culture, we urge the EPA to implement Alternative G. This alternative moves quickly and sustainably reduces contaminants causing harm to Willamette and Columbia River resources. It includes ongoing monitoring and cleanup upriver and downriver from the site, and contributes to healthy fish that are safe to eat for all people. This alternative also holds polluters accountable for creating a safer Portland Harbor.

It is NCUWC's opinion that Alternative I leaves far too much of the river contaminated for generations to come. Monitored natural recovery, with or without enhancement has not been shown to be effective and therefore EPA needs to reduce its use and include provisions in the Record of Decision for contingency actions if monitoring data indicate unsatisfactory performance results. The cleanup plan must result in the removal of the Fish Consumption Advisory so that eating fish from the Lower Willamette is just as safe as eating fish from anywhere else in the Willamette River system, and this must occur within a 10-20 year time frame.

Institutional controls are not effective, especially in the long term. When institutional controls are utilized the potential responsible parties must cover the costs of these institutional controls for their duration, and provisions must be included for evaluating their effectiveness with regular program modifications. The plan must require the state of Oregon to continue upland sources control via legally enforceable means. This site presents characteristics of an environmental justice community, yet EPA has not addressed this issue. EPA needs to assess the environmental justice aspects of this site and take appropriate action to enhance protective and remedial measures. The community expects the final remedy to comply with state environmental quality, especially the water quality criteria for the principle threat waste contaminants. PCBs, dioxins and DDTs in water and fish must meet state water quality standards. Habitat restoration following remedy construction needs to be a required element in the Record of Decision. Aquatic habitat that is disturbed by the remedy must be restored and the full cost paid by the potential responsible parties.

The EPA must hold entities with liability for the pollution accountable. Entities, should pay for a comprehensive cleanup that will protect the health of our communities, our environment and our wildlife.

Sincerely,


Terry Gibson, Board Chair


Andrew Collins-Anderson, Executive Director